

Debtor 1 Rawl D. Harris

Debtor 2 Janet L. Harris  
(Spouse, if filing)

United States Bankruptcy Court for the: WESTERN District of Pennsylvania  
(State)

Case number 18-23521-CMB

## Form 4100R

## Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

## Part 1: Mortgage Information

Name of creditor: Lakeview Loan Servicing, LLC Court claim no. (if known): 9-2

Last 4 digits of any number you use to identify the debtor's account: 2708

Property address: 76 Hickory Street  
Number Street

Ellsworth, Pennsylvania 15331  
City State ZIP Code

## Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

## Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 5 / 1 / 2024  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ 0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

    /    /      
MM / DD / YYYY

Debtor 1 Rawl D. Harris Case number (if known) 18-23521-CMB  
First Name Middle Name Last Name

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/ Andrew M. Lubin Date 01/29/24  
Signature

Print Andrew M. Lubin Title Attorney for creditor  
First Name Middle Name Last Name

Company McCabe, Weisberg & Conway,LLC

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 1420 Walnut Street, Suite 1501  
Number Street  
Philadelphia, PA 19102  
City State ZIP Code

Contact phone ( 215 ) 790 - 1010 Email ecfmail@mwc-law.com

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: Rawl D. Harris and Janet L. Harris  
Debtors

Chapter 13

Lakeview Loan Servicing, LLC, or its  
Successor or Assignee  
Movant

Bankruptcy No. 18-23521-CMB

vs.

Ronda J. Winnecour  
Rawl D. Harris and Janet L. Harris  
Respondents

**CERTIFICATION OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE  
PAYMENT**

I, Andrew M. Lubin, attorney for Lakeview Loan Servicing, LLC, hereby certify that I served a true and correct copy of the foregoing Response to Notice of Final Cure Payment, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: 01/29/24

Rawl D. Harris  
76 Hickory Street  
P.O. Box 481  
Ellsworth,, Pennsylvania  
15331

Scott R. Lowden  
Scott R. Lowden, Esq  
100 Heathmore Avenue  
Pittsburgh, PA 15227  
Attorney for Debtors

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, Pennsylvania  
15219  
Trustee

Janet L. Harris  
76 Hickory Street  
P.O. Box 481  
Ellsworth, Pennsylvania  
15331

U.S. Trustee  
Office of the United States  
Trustee  
1000 Liberty Avenue  
Suite 1316  
Pittsburgh, PA 15222

David A. Rice  
Rice & Associates Law Firm  
15 West Beau Street  
Washington, PA 15301  
Attorney for Debtors

/s/ Andrew M. Lubin

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ANDREW M. LUBIN, ESQUIRE ID # 54297  
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